From: Ken Edwards
To: Chace Pedersen

Subject: RE: CU-24-00003 Schnebly Coulee Solar Farm - Notice of Application

Date: Tuesday, May 28, 2024 11:16:02 AM

Attachments: image001.png

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Chace,

Kittitas PUD does have facilities in and adjacent to the project area. Applicant shall notify Kittitas PUD for any alteration or work near or within the ROW of existing distribution lines.

Thanks,

Ken Edwards Engineering Manager PUD #1 of Kittitas County

1400 Vantage Highway Ellensburg, WA 98926 Phone: 509-933-7200 Ext 818 Ken Edwards@KittitasPUD.com



From: Chace Pedersen <chace.pedersen@co.kittitas.wa.us>

Sent: Tuesday, May 28, 2024 10:45 AM

To: Dan Young <dan.young@co.kittitas.wa.us>; Marvin Douvier (SH)

<marvin.douvier.sh@co.kittitas.wa.us>; Kim Dawson <kim.dawson@co.kittitas.wa.us>;

adminstaff@kittcom.org; storch@kittcom.org; Julie Kjorsvik <julie.kjorsvik@co.kittitas.wa.us>; Laura Kukes <laura.kukes@co.kittitas.wa.us>; Public Health Inspectors

<PublicHealthInspectors@co.kittitas.wa.us>; Lisa Lawrence lisa.lawrence@co.kittitas.wa.us>; Patti Stacey <patti.stacey@co.kittitas.wa.us>; Kelee Hodges <kelee.hodges.pw@co.kittitas.wa.us>; Candie Leader <candie.leader@co.kittitas.wa.us>; Tate Mahre <tate.mahre@co.kittitas.wa.us>; Jackie Sharp <jackie.sharp@co.kittitas.wa.us>; Samantha Cox <samantha.cox@co.kittitas.wa.us>; Josh Fradrickson@co.kittitas.wa.us>; Campron Curtis

Fredrickson <josh.fredrickson@co.kittitas.wa.us>; Cameron Curtis

<cameron.curtis@co.kittitas.wa.us>; Jeremy Larson <jeremy.larson@co.kittitas.wa.us>; Steph Mifflin
<steph.mifflin@co.kittitas.wa.us>; Haley Mercer <haley.mercer@co.kittitas.wa.us>; Christy Garcia
<christine.garcia@co.kittitas.wa.us>; Ken Edwards <Ken.Edwards@kittitaspud.com>; DAHP SEPA

<sepa@dahp.wa.gov>; enviroreview@yakama.com; Corrine Camuso

<Corrine Camuso@Yakama.com>; Jessica Lally <Jessica Lally@Yakama.com>;

Poison Springs LLC PO Box 1015 Kittitas, WA 98934

May 31, 2024

Kittitas County Community Development Services 411 N. Ruby, Suite 2 Ellensburg, WA 98926

Attn: Chace Pedersen, Staff Planner

Re: Conditional Use Permit CU-24-00003 Schnebly Coulee Solar Farm

Mr. Pedersen,

The Schnebly Coulee Solar Farm is a proposed 90 MW solar power production facility to be sited on land owned by our family (Poison Springs LLC). As 3rd generation landowners of these parcels, we support this project as it will provide our family the opportunity to maintain ownership of the property as well as provide us with long-term, predictable revenue. Our family (Clerf Livestock Co.) retired from the livestock industry in the 1980's but we continue to provide yearly grazing rights on our property to S. Martinez Livestock Inc. and Charlton Farms.

The Poison Springs LLC property has limited productivity (no irrigation water rights) so we have chosen to lease our land to Invenergy (Schnebly Coulee Solar) for this proposed project. We believe this project will not adversely impact or increase the cost of farming practices near the project. We also anticipate no significant impact to the ongoing grazing operations.

Invenergy has proven to be a reputable and knowledgeable partner in the renewable energy industry both world-wide and within Kittitas County. The Vantage Wind Farm, located east of the proposed solar project, began permitting in 2007 and became operational in 2010. This project is still owned by Invenergy and Kittitas County themselves have 4 wind turbines located on property at Ryegrass Landfill. Kittitas County Solid Waste receives a yearly revenue payment for these turbines. (Kittitas County Ordinance No. 2009-24)

The Schnebly Coulee Solar project will be a positive benefit to our family and to the community as a whole.

Sincerely,

Judy Webb, Manager

Poison Springs LLC

Members/Owners: Judy Webb

Peggy Tehan MaryBeth Kahn From: <u>Haley Mercer</u>
To: <u>Chace Pedersen</u>

Subject: RE: CU-24-00003 Schnebly Coulee Solar Farm - Notice of Application

Date: Monday, June 3, 2024 10:57:08 AM

Hi Chace;

The land will no longer qualify for the land tax classification of Farm and Agriculture. The parties should reach out to me for removal cost of the parcels from the program.

Haley Mercer
Cadastral Technician
Kittitas County Assessor's Office
205 W 5th Avenue, Suite 101
Ellensburg, WA 98926
Direct (509)962-7633
Office (509)962-7501

www.co.kittitas.wa.us/assessor

Note: email correspondence to this account is a matter of public record and subject to release under the Public Records Act.

From: Chace Pedersen <chace.pedersen@co.kittitas.wa.us>

Sent: Tuesday, May 28, 2024 10:45 AM

To: Dan Young <dan.young@co.kittitas.wa.us>; Marvin Douvier (SH)

<marvin.douvier.sh@co.kittitas.wa.us>; Kim Dawson <kim.dawson@co.kittitas.wa.us>;

adminstaff@kittcom.org; storch@kittcom.org; Julie Kjorsvik <julie.kjorsvik@co.kittitas.wa.us>; Laura Kukes <laura.kukes@co.kittitas.wa.us>; Public Health Inspectors

<PublicHealthInspectors@co.kittitas.wa.us>; Lisa Lawrence <lisa.lawrence@co.kittitas.wa.us>; Patti Stacey <patti.stacey@co.kittitas.wa.us>; Kelee Hodges <kelee.hodges.pw@co.kittitas.wa.us>; Candie Leader <candie.leader@co.kittitas.wa.us>; Tate Mahre <tate.mahre@co.kittitas.wa.us>; Jackie Sharp <jackie.sharp@co.kittitas.wa.us>; Samantha Cox <samantha.cox@co.kittitas.wa.us>; Josh

Fredrickson < josh.fredrickson@co.kittitas.wa.us>; Cameron Curtis

<cameron.curtis@co.kittitas.wa.us>; Jeremy Larson <jeremy.larson@co.kittitas.wa.us>; Steph Mifflin

<steph.mifflin@co.kittitas.wa.us>; Haley Mercer <haley.mercer@co.kittitas.wa.us>; Christy Garcia

<christine.garcia@co.kittitas.wa.us>; ken.edwards@kittitaspud.com; DAHP SEPA

<sepa@dahp.wa.gov>; enviroreview@yakama.com; Corrine Camuso

<Corrine Camuso@Yakama.com>; Jessica Lally

noah_oliver@yakama.com; Casey Barney <Casey_Barney@Yakama.com>; kozj@yakamafish-

nsn.gov; Guy Moura <guy.moura@colvilletribes.com>; sam.rushing@colvilletribes.com; Connor Armi

<connor.armi.hsy@colvilletribes.com>; darnell.sam.adm@colvilletribes.com;

john.sirois.adm@colvilletribes.com; milton.davis.adm@colvilletribes.com;

steve@snoqualmietribe.us; dahp@snoqualmietribe.us; Adam Osbekoff

<adam@snoqualmietribe.us>; Mau, Russell E (DOH) <Russell.Mau@DOH.WA.GOV>;

tebu461@ecy.wa.gov; lowh461@ECY.WA.GOV; FormerOrchards@ecy.wa.gov;

From: Suzanne Whitehall
To: Chace Pedersen

Subject: notice of application project CU-24-00003-neighbor to project

Date: Monday, June 3, 2024 11:22:33 AM

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

Good morning, Chance Pedersen,

My name is Suzanne Konold, I live at 21 Bonanza Dr. and my property will be greatly affected by fencing and your solar panel grid. I just want to start with I am happy to see the solar fields come into our area, I do not mind the temporary construction zones as these solar fields come in. The most activity this area gets is Coyotes and very occasionally the elk during hunting season. The Flaura and Fawna of this area is sage, grasses and some wildflowers as throughout our land scaping. The addition to the solar panels will not affect this area as some may propose.

I am writing in as a positive neighbor and would like to keep in the knowing of this project. Especially since this property line of the solar panels will have fencing along my direct fencing line. I support your efforts in energy efficiency and would urge all other neighbors to encourage this as well.

Thank you for your time,

Suzanne Konold whitehalls@yahoo.com

From: <u>Jen Beaulieu</u>
To: <u>Chace Pedersen</u>

Subject: Schnebly Coulee Solar Farm Project CU-24-00003 comment

Date: Wednesday, June 5, 2024 2:13:36 PM

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

Dear Kittitas Co Staff Planner Chace Pedersen,

We're writing in regards to the proposed Schnebly Coulee Solar Farm Project CU-24-00003. Our family lives at and owns the single family residence located at 2280 Sage Hills Dr. Our house is located directly to the east of and less than 500 feet from the proposed location of the solar farm.

In general, our family supports green energy production when produced responsibly with care for local wildlife, residents and minimizing destruction of native habitats. While we don't outright oppose this project, we do have concerns.

Firstly, due to the close proximity of the proposed solar farm to our home, fire prevention and the ability for fire personnel to extinguish a fire before it spreads to our property is of utmost concern. It appears, based on the site plan of the solar farm that there is very minimal buffer between the solar panels and the property line/fence as well as very limited access for firefighting personnel and equipment to access much of the site. Given the strong and frequent WNW winds in our area, this project will significantly increase wildfire risk to our home. A Kittitas Fire Chief spoke at a recent HOA meeting and said that "it's not IF a wildfire occurs in our area, but WHEN". We are on wells here with water limited to minimal domestic use only. We don't have irrigation or adequate allowable use of well water to mitigate fire risk on our own by wetting surrounding vegetation in case of near by fire.

Secondly, not only will our family be financially negativity impacted by this project but our quality of life and ability to enjoy our property will be diminished. The value of our property and the marketability if we need to sell will decrease. Studies have been conducted showing that solar farms can raise the surrounding temperature 5 to 7 degrees fahrenheit. Due to the close proximity and the winds blowing the artificially heated air directly to our home, in the already hot summers we have, our AC costs will increase. In addition, due to the glare from the panels along with the hotter outdoor temperatures, the project may negatively impact the habitabilty of our property and surrounding land for both people and wildlife during summers.

Thirdly, given that solar panels have a life expectancy of approximately 30 years, if at that time or at any time, the project is abandoned, what guarantees will there be that it will be properly and responsibly decommissioned and that the land not be left to become a fire hazard as a field of cheat grass and weeds? If it's left unmanaged and abandoned, our fire risk will further increase and our propery values will drop even more.

Fourthly, this project will certainly negatively impact local wildlife, especially the elk herds who utilize this land. The Sage Hills neighborhood keeps over 90% of the land as native shrub steppe and accessible to all wildlife. The proposed fence, which will not only enclose the solar farm and prohibit the elk from entering, will also fence the elk and coyotes within the Sage Hills neighborhood on the west and south sides, potentially creating a stressful situation for the wildlife and a dangerous situation for residents of Sage Hills.

While considering approving this project as it is proposed in its scope and location, we ask that Kittitas Co staff not overlook the negative impact it will have on near by residents, property owners and wildlife.

Thank you for your time, Beaulieu Family 2280 Sage Hills Dr.

Citizen Comments

CU-24-00003 Schnebly Coulee Solar Farm

We own lot 4 of the Sage Hills development which would be immediately contiguous to the proposed commercial solar project labeled Schenbly Coulee Solar Farm. We have lived here over 15 years.

We are not opposed, per se, to the idea of a commercial solar farm if it was installed in such a way as to preserve the shrub steppe - by NOT grading and leveling for the panels, but installing them at height above existing vegetation and grade and burying 100% of transmission.

In the absence of any such plan however, we have the following concerns and questions about this proposal.

- I. Loss/fragmentation of critical shrubsteppe habitat a vanishing ecosystem in the western US. The CUP documents state: "Site preparation will occur in a manner to minimize grading, vegetation removal, and topsoil removal" however the loss of habitat unless the solar arrays will be installed above existing vegetation will still be catastrophic for local wildlife and vegetation.
- II. Why not move this entire project to the County's section at Ryegrass which is already a degraded habitat due to the presence of two landfill sites? Moving this project would put it closer to the substation for tie-in (cheaper for Invenergy) while offsetting County loss of income when the LPL closes by leasing the section to applicant. The shrubsteppe in the area has been routinely bladed off by the County and therefore would not present such a catastrophic loss of habitat as this proposal. This could turn a negative into a positive as other communities have discovered.¹
- III. Wildfire risks. We are currently in a drought in eastern Kittitas County and it will only get worse. As previous wildfires have demonstrated, out-of-area work crews don't think twice about driving hot catalytic converters over dry vegetation thus sparking catastrophic fires. Sage Hills is directly downwind of the proposed facility and there is no apparent thought to preventing accidental fires sparked by construction activities (siting water tanks onsite, instructing crews how to combat fires, preventative construction and post-construction measures). Additionally, what fire mitigation will be in place after completion of construction? Poor quality equipment, faulty installation, improperly sealed mechanisms, compromised electrical wiring, and irregular maintenance can all result in a fire. If we missed such documentation regarding mitigating fire risk, please point it out.
- IV. Construction dust. Blading off vegetation will result in blowing dust/loess directly across Sage Hills, given the prevailing WNW winds. This will degrade eastern property owners' use of property. Will construction routinely wet down bladed surfaces? Will bladed sections be hydroseeded?

¹ From Trash to Treasure: turning unproductive landfills into solar powered revenue.

- V. Sheet C-300 mislabels the project boundaries (and this error is repeated throughout the CUP documents where project boundaries are shown). On this page, to the south of Sage Hills, the map shows C-306, C-307, C-308 a third of the way onto Sage Hills properties, encroaching into private property not a part of this proposal. C-304 and C-302 are shown also overlapping into private property in Sage Hills, but not as far as the south encroachment. This page should be redrawn to correctly reflect boundaries as it affects proposed setbacks. Appendix E, page EX-0 maintains this inaccurate boundary and should be corrected. I am sure there are others with the same inaccuracy.
- VI. **Under general notes,** setbacks, 7.6 is labeled Elk Corridor of Wildlife Migration. Yet the SEPA Filed for this project states there is no wildlife migration present in the area. They can't have it both ways.

VII. INADEQUATE SEPA & WILDLIFE SURVEYS

- A. The proposed project would largely destroy a vanishing shrubsteppe ecosystem, an environment the county's own code strives to protect.
- B. SEPA page 10, 5.b. erroneously states " no federally listed threatened or endangered species are known or are likely to occur within the Project area due to lack of suitable habitat being present." We have lived here over 15 years and in that time, we have regularly seen the following nesting/hunting/ in the local shrubsteppe: Phrynosoma douglasii (pygmy short-horned lizard), Asio flammeus (short eared owl routinely nest on Poison Springs land. Indeed, one year, we observed two nesting pairs raise 18 offspring between them on Poison Springs land), Taxidea taxus (American badger several active burrows in the area), Aquila chrysaetos (golden eagle), Haliaeetus leucocephalus (bald eagle), Mustela frenata (weasel), Athene cunicularia (burrowing owl indeed, the local Audubon society has made trips to the area to observe burrowing owls), townsend ground squirrel (Urocitellus townsendii), and with the exception of the lizard and owls, Invenergy fails to identify these animals in the area, especially the burrowing owl and townsend ground squirrel. We have photos of many of these, if needed.
- C. We have also seen Pediocactus nigrispinus (hedgehog/snowball cactus), and Astragalus misellus var. pauper (pauper milkvetch) not identified as present in the CUP.
- D. SEPA page 10, 5.c. incorrectly states the area is not part of a migratory pathway. The Colockum elk herd² routinely uses the area for winter range we can provide photos showing this if needed as well as a key migratory path for horned larks, shrikes, other passerines. Indeed, the SEPA 5.d. goes on to describe project design adjustment to allow for elk migration. How does this not contradict 5.c?
- E. Hidden risks to wildlife³. We don't know what we don't know. This sort of project is so new, research on wildlife impact both initially and longterm is sorely

² Program Aims to Reduce Conflict between Elk, People in Kittitas County

³ Solar Impacts on Wildlife and Ecosystems

- lacking. For this reason, we hope the County will require applicant file a bond to address and mitigate unexpected impacts.
- F. For these reasons, we oppose a designation of SEPA nonsignificance.
- VIII. Who will pay for decommissioning this project? Rural Kittitas County residents are asked to bear the loss of habitat, degradation of property values, loss of views, etc. Will residents also bear decommissioning costs which will not only include removing the panels and other infrastructure, but in rehabilitating the shrub steppe? Will Invenergy be required to post a bond for this project decommissioning? Because it should.
- IX. **Electromagnetic Field impact**. Although EMF levels drop with distance and pose little, if any threat to nearby humans, what impact will it have on local wildlife? Particularly on sensitive species?
- X. **Solar Glare**. While it is commendable that Invenergy states it will turn off/limit night time lighting to reduce wildlife impact, what impact will solar panel glare have on wildlife particularly insects, bats, avian passerines and others? The glare of multiple panels can contribute to 'lake effect' making them appear to be water and some waterbirds can be impacted when they misidentify panels for water ⁴.

I am sure we will have additional questions. Thank you for this opportunity to comment on this project.

Nels & Charli Sorenson 1970 Sage Hills Drive Ellensburg WA 98926 nelscharli1970@gmail.com

⁴ Impact of Solar Energy on Wildlife is an Emerging Environmental Issue.

From: Cory Wright
To: Chace Pedersen

Subject: FW: Written Comment - CU-24-00003 Schnebly Coulee Solar Farm

Date: Friday, June 7, 2024 8:23:50 AM

Attachments: Elk video.MOV

elk signs 1.png elk signs 2.png

This one too

From: Ralph Teller < hiker98024@outlook.com>

Sent: Thursday, June 6, 2024 10:44 AM

To: Cory Wright <cory.wright@co.kittitas.wa.us>

Subject: FW: Written Comment - CU-24-00003 Schnebly Coulee Solar Farm

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Cory – we appreciate your support!

Sent from Mail for Windows

From: Ralph Teller

Sent: Tuesday, June 4, 2024 6:55:07 AM

To: chase.pedersen@co.kittitas.wa.us careygreg@hotmail.com; Charli Sorenson sagehillshoa@gmail.com; Randal & Kanya Brown brown_2684@msn.com>

Subject: Written Comment - CU-24-00003 Schnebly Coulee Solar Farm

Dear Chace:

I am the owner of Lot 9 at the Sage Hills residential community. My property is adjacent to and north of the Poison Springs property which is the subject of the Schnebly Coulee Solar Farm proposed solar farm project.

Here are my written comments for the official record.

- 1. Large elk herds migrate across and forage on the subject Poison Springs property. Attached is an image of a large herd of about 80 elk I saw moving from the subject Poison Springs property onto my lot. I took this photo on October 13, 2023 3:17pm. The photo was taken while I was walking along Sage Hills Drive at about Lot 7 looking south/southeast.
- 2. Attached is a video of about 250 elk migrating from the subject Poison Springs property onto my property taken three winters ago by the owners of Sage Hills lot 6 owners.
- 3. The subject Poison Springs property and the adjoining area properties are the lands that support some of the largest elk herds in Washington. Washington State is aware of these important elk migrations and for the safety of the public and of the herd, posts 'Elk Crossing' warning signs along I-90 both east and west bound near the subject Poison Springs property. The State during the winter months also posts large portable electronic signs along I-90 to further alert the public of these large elk herd area migrations. See the attached image.
- 4. There are significant health risk associated with living near solar farms. See What are the Health Risks when Living Near Solar Farm Places in 2022? | EMF Risks (emf-risks.com) According to the article:

"According to the World Health Organization, there is a health risk of electromagnetic hypersensitivity associated with living near solar farms. This condition is characterized by a range of symptoms that are triggered by exposure to electromagnetic radiation fields. These symptoms can include headaches, fatigue, skin rashes, and sleep disturbances.

It is a condition caused by exposure to <u>electromagnetic fields</u> (EMF) near the solar farms. There are a few studies that have looked at the health risks associated with living near solar farms.

<u>A study in Australia</u> found that people who live near solar farms are more likely to experience headaches, dizziness, and nausea. There could also be an increased risk of cancer in people living near solar farms.

<u>Some studies</u> have shown that exposure to high-frequency radiation from solar farms can increase the risk of cancer but more research is needed to determine if there is a real link between solar farms and cancer."

In summation, the proposed solar farm project is an atrocity that will harm the health, safety and welfare of the local natural wildlife, vegetation and nearby residents, and significantly damage nearby landowner values.

The proposed project should be summarily denied.

Regards,

Ralph Teller, Lot 9 owner.

June 7, 2024

✓ Chace Pedersen

Cory Wright

Chace.pedersen@co.kittitas.wa.us

Cory.wright@co.kittitas.wa.us

Re: Poison Springs Land and Solar Industrial Site proposed

CU-24-00003 SCHNEBLY COULEE SOLAR FARM

After developing, working, managing, owning and operating our business, Yakima River RV Park, for twenty-six years on Ringer Loop Road, just off Canyon Road in Ellensburg, we decided it was time to sell and move on.

We are currently building a million-dollar home and shop in the beautiful neighborhood of Sage Hills, off Vantage Highway. Our plan is to retire and spend the remainder of our lives in the rural area enjoying the 360-degree view of rolling hills, Mount Rainier, Mount Adams, and the beautiful green Kittitas Valley with all its largely unspoiled natural resources.

Recently we were made aware of a Conditional Use Permit Application with Kittitas County for an exceptionally large Solar Industrial Site to be built on our doorstep. This Industrial Project immediately borders thirteen of the 24 Sage Hills landowners' properties. It appears the Industrial Project will cover more than double the size of the whole Sage Hills Neighborhood.

This is extremely disappointing, and we have questions and comments we would like considered in your decision:

- 1. Is the land zoned Ag 20 or Industrial. If the land is zoned Industrial, when was it rezoned Industrial?
- 2. Who owns the land where the Solar Industrial Site is proposed?
- 3. Is the land leased to the Solar Company or are they purchasing the land and if purchasing, are they a foreign company.
- 4. There will be dirt erosion and the dirt will become "Dead Dirt", unsuitable for crop production. What measures will be taken during construction and the life of the project to mitigate dust and dirt. There will be destruction of the underlying farm acreage because the site is typically cleared of much of its topsoil, compacted, and chemically treated to control plant growth. Chemicals & herbicides are used to eliminate plant growth where large numbers of solar panels will be clustered. If used, these chemicals will affect our water sources.
- 5. Land disturbance is not confined to the footprint of the operating site, but also includes the associated construction of access roads, right of ways, and the upgrading or construction of transmission lines.
- 6. Herbicides and chemicals used for ground clearance and maintenance should be identified and records should be maintained and available for inspection to show the volume and frequency of

their use as well as location where they are stored and whether they are slow-time release or not. All toxic metals contained in solar panels should be identified.

- 7. What will the air quality be? Our air quality is extremely important to us.
- 8. While some local employees may be used as part of the construction crew that clear and level the site, their jobs are temporary and end when the site preparation work is completed.
- 9. Storms can damage solar panels containing highly toxic metals known to be carcinogens. Cleaning up of toxic waste material is difficult and very costly, and there is no certified regional means of solar panel toxic waste treatment, recycling or decommissioning. The LLC Corporations who install Solar Industrial Sites take no responsibility for future damage if they are only leasing the land rather than owning the land. Some of these companies have left broken glass, damaged, twisted racks, crushed solar panels and damaged wiring, and no bond to back up the mess caused. They leave town and it is left up to the landowner to clean up, which could take millions of dollars and be an eyesore for eternity. High wind conditions could potentially damage and dislodge the solar panels, with glass and toxic materials strewn over a wide area far beyond the footprint of the solar site. Federal, State and County regulatory authorities need to address the disposing of solar panels in regular landfills, with toxic materials leaching into the soil and water supply. The cost of disposal or recycling must be built into the business model of those operating Solar Sites as well as financial security and secured bonds to cover the anticipated cost of cleaning up solar waste and decommissioning.
- 10. What is the impact on the local environment if land is converted from its existing farm or natural state to a solar power generation station? This is a question that requires a thorough environmental assessment because the potential for substantial environmental damage can be significant, long lasting, impacting neighboring properties and be very costly to remediate.
- 11. None of the power generated by a Solar Site is channeled to a local resident, local business or directly to any local consumer. It is sold to public utilities or electric power contractors who purchase it for sale to a grid.
- 12. Will this Solar Site be exempt from property tax revenue in Kittitas County?
- 13. What is the total acreage planned to be used?
- 14. The proposed land is a critical habitat for wildlife, namely elk and deer and smaller animal populations. Farmland and natural sagebrush land not only absorb carbon, but they also absorb water which helps to avoid erosion and runoff and they provide critical habitat for countless numbers of species, plants and insects. The US Fish and Wildlife Service has referred to Solar Industrial Sites as "mega-traps" for wildlife when the high temperature solar beams ignite insects and birds.
- 15. This proposed Solar Industrial Site will ruin the whole rural atmosphere of the area.
- 16. Kittitas County and the Ellensburg Valley are aesthetically pleasing and are marketed to attract families, retirees and tourism to the area and to reaffirm the conservation goals and values of local government to existing residents. A City of Ellensburg ad states unique environment and quality of life.
- 17. The value of homes in the Sage Hills neighborhood will drastically decrease in value.
- 18. What about glass reflection and glare? All lighting in our neighborhood must be pointed in a downward direction.

- 19. Sage Hills homeowners and landowners will be at risk of a much higher fire danger due to solar panel sites posing the risk of electrical fires caused by arc flashes and power surges which could require County services by fire and rescue squads.
- 20. A Solar Industrial Site has nothing to do with farming or activities related to agriculture.
- 21. The Solar Industrial Site is a disruption of the local ecosystem.
- 22. Solar Industrial Sites contain highly toxic materials.
- 23. Solar Farms pose a direct and very real threat to scenic beauty, and unspoiled natural resources.
- 24. The production of Solar Panels as one means of helping to reduce our reliance on fossil fuels was never intended to be a license for the solar industry to destroy productive farmland, forests and unspoiled natural resources, which are the cornerstone of most rural communities. Solar panel business entities are usually non-resident corporations who view our open space lands as assets to be exploited, not assets to be preserved.

Because Solar Industrial Sites are industrial properties that are by design destructive of farmland, they should not be approved as a "Conditional" or "Permitted" use in an area designated by the County as "Agricultural District", or near residential areas. Nor should they be approved in an environmentally sensitive area where they would pose a threat to wildlife. If approved at all, solar farms should be sited in an industrial district where other industrial activities are authorized or located far enough away from residential areas to prevent them from affecting the scenic beauty that we purchased our property for.

This Solar Industrial Site on the Poison Springs Land neighboring Sage Hills residential area should be denied a Conditional Use Permit.

Thank you for your consideration.

Sincerely,

Randy and Darlene Grant

791 Ringer Loop Rd.

Ellensburg WA 98926-8481

509 899-7714

503 572-0930

yakimarvpark@yahoo.com

dtroop717@outlook.com

CHALE PEDERSEN

Randy & Darlene Grant 791 Ringer Loop Rd Ellensburg, WA 98926

DECEIVED N JUN 1 0 2024

Kittitas County CDS

KCCBS #2 411 N. Rusy St., #2 ELLENSBURG WA 98926

From: Connor Armi
To: Chace Pedersen

Cc: Guy Moura; Hanson, Sydney (DAHP)

Subject: Re: CU-24-00003 Schnebly Coulee Solar Farm - Notice of Application

Date: Monday, June 10, 2024 9:01:24 AM

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

Hello Chace,

This consult is in reference to CU-24-00003 Schnebly Coulee Solar Farm. This undertaking involves ground disturbance for the construction of the solar facility.

The proposed project lies within the traditional territory of the Moses-Columbia Tribe, 1 of the 12 constituent tribes of the Confederated Tribes of the Colville Reservation (CTCR), which is governed by the Colville Business Council (CBC). The CBC has delegated to the Tribal Historic Preservation Officer (THPO) the responsibility of representing the CTCR with regard to cultural resources management issues throughout the traditional territories of all of the constituent tribes under Resolution 1996-29. This area includes parts of eastern Washington, northeastern Oregon, the Palus territory in Idaho, and south-central British Columbia.

There are known cultural resources of precontact and historic significance nearby and this particular plat is considered Low to Very High Risk for an inadvertent discovery according to the DAHP predictive model. A relevant cultural resource survey has already been completed in consultation with the Confederated Colville Tribes History and Archaeology Program.

CCT requests an Unanticipated Discovery Plan during implementation to ensure compliance with all Section 106 and relevant cultural resource laws both federally and to the state of Washington.

Thank you for consulting with the Colville Confederated Tribes History and Archaeology Program.

On behalf of Guy Moura, Tribal Historic Preservation Officer.

Sincerely,

Connor Armi | Archaeologist Senior MA, RPA History/Archaeology Program

Confederated Tribes of the Colville Reservation PO Box 150 | Nespelem, WA 99155 d: 509-634-2690 | c: 509-631-1131

connor.armi.hsv@colvilletribes.com

On Tue, May 28, 2024 at 10:45 AM Chace Pedersen < chace.pedersen@co.kittitas.wa.us > wrote:

Good morning,

From: Guy Moura
To: Chace Pedersen

Cc: Hanson, Sydney (DAHP); Connor Armi; Light, Abi; Guy Moura

Subject: Re: CU-24-00003 Schnebly Coulee Solar Farm - Notice of Application

Date: Monday, June 10, 2024 12:46:58 PM

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

Chace,

In addition to the Post-Review discovery plan(s), Connor and I teleconferenced with Invenergy and some of the archaeologists last week to discussed edits to the reporting and possible avoidance areas, etc.

lim ləmt, qe?ciéwyew, thank you

Guy Moura

Manager, History/Archaeology Program

Tribal Historic Preservation Officer

Confederated Tribes of the Colville Reservation

(509) 634-2695

On Mon, Jun 10, 2024 at 9:01 AM Connor Armi < connor.armi.hsy@colvilletribes.com > wrote:

Hello Chace,

This consult is in reference to CU-24-00003 Schnebly Coulee Solar Farm. This undertaking involves ground disturbance for the construction of the solar facility.

The proposed project lies within the traditional territory of the Moses-Columbia Tribe, 1 of the 12 constituent tribes of the Confederated Tribes of the Colville Reservation (CTCR), which is governed by the Colville Business Council (CBC). The CBC has delegated to the Tribal Historic Preservation Officer (THPO) the responsibility of representing the CTCR with regard to cultural resources management issues throughout the traditional territories of all of the constituent tribes under Resolution 1996-29. This area includes parts of eastern Washington, northeastern Oregon, the Palus territory in Idaho, and south-central British Columbia.

There are known cultural resources of precontact and historic significance nearby and this particular plat is considered Low to Very High Risk for an inadvertent discovery according to the

From: Cory Wright
To: Chace Pedersen

Subject: FW: Schnebly Coulee Solar Project **Date:** Tuesday, June 11, 2024 8:19:56 AM

Not sure if you were copied on this.

----Original Message----

From: Jackie Halsted <jhalsted18@yahoo.com>

Sent: Monday, June 10, 2024 4:00 PM

To: Cory Wright <cory.wright@co.kittitas.wa.us>

Subject: Schnebly Coulee Solar Project

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

Mr. Wright:

My name is Jackie Halsted and I am a property owner a Lot 8, Kittitas County Parcel No 951732 in the Sage Hills development. I am writing to voice my strong opposition to the Schnebly Coulee Solar Project that has applied for conditional use. I have several concerns with this project, but not the least of which is the significant predictable negative impact on property value. I purchased this land specifically to be in a rural setting away from industrial style development. This project significantly disrupts that environment for myself and the other property owners. I understand that we have a need for renewable energy sources but this is not the right place for this project and I would urge the county to reject the conditional use application.

Jackie Halsted

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June 10, 2024



Kittitas County CDS

Kittitas Audubon Society P.O. Box 1443 Ellensburg, WA 98926



Chace Pederson, Staff Planner Kittitas County Community Development Services 411 N. Ruby, Suite 2 Ellensburg, WA 98926

Subject: Comments regarding Schnebly Coulee Solar Farm CUP-24-00003

Dear Mr. Pederson,

Thank you for the opportunity to review the Schnebly Coulee Solar Farm Conditional User Permit application. This is the first large-scale solar power production facility proposed for construction within the large block of contiguous shrub steppe habitat in eastern Kittitas County. These working lands have supported livestock grazing but continue to retain the character, plants and habitat features needed by native shrub steppe wildlife.

Kittitas Audubon Society was involved with the review and development of two large wind power projects that were constructed in the shrub steppe lands north and east of this new solar project, and served on Technical Advisory Committees for each of these wind power projects. The Wild Horse project north of the Vantage Highway was developed for Puget Sound Energy and included two construction phases. The project south of the Vantage Highway and east of the currently proposed solar project was developed by Invenergy, which is the same company developing the Schnebly Coulee Solar project.

The Schnebly Coulee Solar Farm project is of special importance, as it is the first Large-Scale solar project to be constructed in a large block of shrub steppe lands in Kittitas County. This project is significantly different than the other operational solar projects in our county and it will be a significant "learning project" for future developments in the county. The lands within the proposed project include complex mosaics of shallow soils within areas of deeper soils. Shallow soils sites commonly have basalt rock within a short distance of the surface. The soil surface of these shallow sites may be comprised of 50% or more of rock. Over the course of the growing season, the soil moisture varies from saturated in the spring to very dry and hardened during the summer and early fall. The plant communities in these sites are comprised of species of grasses, shrubs, and forbs, and these in turn support unique communities of wildlife.

General Comments

There are good conservation measures incorporated in the project, including:

- Consolidating the solar panel arrays to retain larger swaths of intact shrub steppe.
- The use of a "drive-and-crush" method of site preparation for the solar panel arrays, thereby retaining the residual native vegetation, topsoil, and the seedbank in place in the soils.
- Modifications to fencing to accommodate animal movement.
- Incorporating conservation easements on shrub step lands into the project to offset impacts by preserving shrub steppe habitat at the local landscape scale.

The intensity of the project design reduces some important environmental impacts of the project but does present some risks. Achieving a good balance during final design and construction is important.

Concerns

- Two large wind energy construction projects were undertaken in shrub steppe near the currently proposed Schnebly Coulee solar project. (One of these projects was developed by Invenergy the proponent of the current project. The other was developed by Puget Sound Energy.) The construction of these wind energy projects provided a lot of lessons about construction techniques and about managing construction in rocky and shallow soil shrub steppe lands. There were also important lessons regarding site restoration and revegetation. Experiences from these prior projects improved techniques and practices for minimizing adverse impacts during construction (e.g. clearing, trenching, road construction, handling soils, etc.) and improved site restoration. We are surprised and disappointed that information provided in the Schnebly Coulee project CUP, (including its attachments and SEPA Checklist) does not mention nor specifically incorporate the lessons learned from these nearby energy projects in Kittitas County.
- Greater consideration of the importance of minimizing handling of soil and retaining soil (that must be cleared for construction) at its original location is needed. Clearing limits in shallow soils or soil complexes with shallow elements, should be restricted to the minimum possible for construction. (In shallow soil sites, the high rock component greatly hinders the ability to collect, save and re-apply the soil.) To the greatest extent possible, if soil must be removed, it should be windrowed at the near edge of the clearing limit, and redistributed as soon as possible post-construction.
- Greater recognition of the importance of native soil in restoration is needed.
 Commercially available quantities of suitable native seed for site restoration is available for only a very few of the plants typical of these shrub steppe sites. To

achieve adequate restoration post construction, a broad complement of native plants is needed. The soil that has been stripped and saved during construction (and which contains the full complement of native plant seeds for the site naturally) is an essential, valuable resource. Care is needed to preserve all native "topsoil" such in a manner that it can be successfully used to restore native plant communities.

• The CUP application disregards the likelihood that mobile wildlife species of special concern not detected during planning surveys may in fact occasionally use the project lands. For example, sage grouse and Townsend's ground squirrels are known to occur in the large shrub steppe lands adjacent to the project. It would be prudent to recognize that these species may use the project site, perhaps infrequently, and prescribe what actions should be taken for that contingency during construction and operation.

Additional Recommendation

• This project is special in that it is the first Large-Scale solar project to be constructed within a large block of shrub steppe lands in Kittitas County. It would be prudent learn as much as possible from this project and ensure that what is learned can be carried forward into future solar projects. The CUP and SEPA review should require that a technical advisory committee of citizens and technical experts be created to review and advise this project from construction, site restoration through the first year of operation. (Note that the approval of the first wind power projects in Kittitas County included the creation of technical advisory committees to work with each project proponent to provide review and advice to the proponent and the regulating agencies.)

Thank you again for the opportunity to review this conditional use application and for considering our concerns and comments.

Sincerely,

Steve Loitz
President

Kittitas Audubon P.O. Box 1443

Ellensburg, WA 98926

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Chace Pedersen
411 N Ruby St, Ste 2
Ellensburg, WA 98926
Chace.Pedersen@co.kittitas.wa.us

Re: CU-24-00003 Schnebly Coulee Solar Farm

To Chace,

We own lot 13 of the Sage Hills development, neighboring the proposed solar project, Schnebly Coulee Solar Farm. We don't oppose solar energy, in fact there are many benefits to green energy, which is why we support this project. Considering this would be a huge impact on ourselves and our neighbors, we feel it is important to keep our dialogue open. Making sure that our questions and concerns are addressed when moving forward.

- 1) Glares: The reflective surfaces of solar panels can sometimes create disruptive glares. Given the number of panels that would be installed, this can be intrusive and disruptive to our daily lives. Are there plans to conduct an analysis of glints and glares that would come from a solar farm in proximity?
- 2) Visual impact: Solar farms that are in large open spaces can alter the visual landscape of an area. You'd be taking away our sage surroundings and replacing them with solar panels, which are not visually appealing to most. This will detract from the natural beauty of our surroundings. The reason we chose Sage Hills to build our forever home is because of the healing properties and beauty the sage provides. We feel devastated at the fact that our natural beauty will be replaced with acres of solar panels. Are there plans to maintain the beautiful landscape that we all enjoy and treasure?
- 3) Noise: Solar panels are generally silent, but the equipment used to maintain and manage a solar farm, which we assume can produce noise. Project this scale, will be utilizing industrial size equipment. Will measures be taken to minimize the noise level?
- 4) Land use: Only 40% of the 10.4 million acres of eastern Washington's shrub steppe habitat remains relative to the mid-1800s. Were there other areas that were looked considered? Are there similar areas available that would not be so intrusive? Why the property next to Sage Hills was selected?

- 5) Heat emissions: Urban heat island effect, this can raise temperatures at night by several degrees. The impact of heat emissions to this magnitude is unknown, so this obviously would be another concern.
- 6) Electromagnetic fields (EMF): Scientific research on EMF is ongoing, which makes exposure to EMF a serious health concern.
- 7) Decommission: When this solar farm reaches the end of its operational life, decommissioning activities may be required, which can have environmental implications. Will this information be made available?

I believe these disadvantages can be mitigated through careful planning, design, and communication between solar farm developers and local communities. Our hope is that our opinions and concerns are taken into serious consideration. On behalf of lot 13 and it's neighbors.

Sincerely,

Leo & Maricar Perrone Lot 13, Sage Hills Development From: <u>Logan Darrow</u>

To: Chace Pedersen; Cory Wright
Subject: Schnebley Coulee Solar Farm
Date: Monday, June 10, 2024 4:26:08 PM

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

Hello,

I am a homeowner on Sage Hills Drive and it is with distress I have learned of the plans by Invenergy to install a large solar panel facility that will wrap halfway around the neighborhood of Sage Hills.

Approximately 80% of Washington's original shrub steppe ecosystem has been lost or degraded due to development. The small percentage remaining should be preserved for the health of the ecosystem at large for today and future generations. Something this important should not be handed over for destruction by a private Chicago-based corporation looking to make a profit.

Our shrub steppe provides habitat for several species found nowhere else in the state, including the greater sage-grouse, sagebrush sparrow and burrowing owl. Additionally, other birds like chukar, common ravens, black-billed magpies, Swainson's hawks, red-tailed hawks, horned larks and west meadowlarks thrive in this landscape. And because no hunting is allowed in the Sage Hills neighborhood, a herd of elk frequently passes through this area.

Along with the loss of the valuable ecosystem, a project this size will increase the threat of wildfire, endanger residents' health by introducing dust and pollutants into the air due to frequent high winds, and lower the value of the abutting private homes. Additionally, the process of disturbing the soil will invite an invasion of cheatgrass and other weeds that pose a danger to the Kittitas Valley's valuable hay crops.

Please deny this project that will benefit no one but the out of state corporate developer.

Thank you,

Logan Darrow

293 Sage Hills Drive

Ellensburg WA 98926

June 10, 2024

Kittitas County Community Development Services 411 R. Ruby St., Suite 2 Ellensburg, WA 98926



Kittitas County CDS

Re: CU-24-00003 Schnebly Coulee Solar Farm

To say I was shocked as I read through all the documents for this project, might be putting it lightly. Why would Kittitas County feel there is no need for a full Environmental Impact Statement to be done for this project is beyond my understanding. This is a very large solar farm, not like others done in this county. This involves more than 1,000 acres total, with 700+- acres being used for the immediate application! It is proposed for land that is currently primarily native shrub steppe habitat, with occasional grazing occurring. Are the county planners aware that in Washington State, there is less than 20% of this habitat left, or do they simply not care about all the plant and animal species that will be negatively impacted?

The developers imply in their commentary, that many species that might have been here were not observed and so must not be here! We've all watched you, driving your pickups thru the properties involved, without any concern for protecting any of the plant life you are destroying, as well as the other heavier equipment that has been moving all over the lands west and south of Sage Hills. Many other birds and raptors than you mentioned make their homes here, I have photographic proof, as do many of the neighbors. We see herds of elk move through the properties intended for the project from fall until late spring/early summer, depending on weather and feed. Townsends ground squirrels, (listed as an "at risk" population) live on these lands, as well as Pygmy short eared lizards (horned toads) and many other mammals that we have all seen.

Fencing is not described, except to say they have been in discussion with WDFW. All the other solar farms in the county seem to have 6' chain link fencing, with additional wire on the top of some. Why in the world is it necessary to do fencing to prevent creatures being able to move through the area with the solar arrays, since I doubt they will be interested in stealing or damaging them? Why not a perimeter fence on the sides towards other ground that supports wildlife, (north, east and south) that is a 3 strand fence designed to allow young elk and deer to move through without being

injured? All the Sage Hills lands adjoining are private and the owners have no interest in allowing public access through their parcels for the public to access land adjoining.

Why is there not more discussion, or at least a public discussion about moving this project to the soon closing Kittitas County land fill location? That land is already terribly damaged for habitat and is immediately joined to Invenergys Wind Farm. The substation is closer, it would have a far smaller impact on the adjoining properties, and maybe the county and Invenergy could make it a joint effort to restore as much of it as possible to better condition. To say this project will have a negative effect on the property values of the adjacent homes is for certain. This is not a small solar farm, this is a full scale industrial sized project, with none of the benefits accruing to Kittitas County, as usual, but going to out of state or to the west side. There will be jobs during construction but few to none once it is built. Where are the benefits to Kittitas County, because I doubt we will make a lot of tax dollars to offset the value reduction that will need to be made for loss of value of homes surrounding the project.

Because I'm sure other neighbors and citizens will have mentioned problems with wildfires, I won't get in to a long discussion here, but trust me, we all have sleepless nights when the wind is howling and conditions are dry and we listen to the rumble of thunder telling us of the risk we face to live on this beautiful place. Then I could write a book about the habitat restoration plans...cheat, mustard and Russian thistle are not on the state or county weed list, and so I will be very surprised if Invenergy finds it "necessary" to control those weeds, as the KC Noxious Weed Board cannot do much to require control. But guess what is the risk with those three invading weeds? They are the carriers of fire in wildfires. Russian thistle goes airborne and has been tracked by GPS going 3-5 miles casting embers as it flys in high winds, starting fires ahead of fire lines. Cheat and mustard light off like small explosives, fun for us all, NOT!

Because I am a serious native plant student, I see plants on Sage Hills I see in few other places in the dry parts of Washington State. They make no mention of the wildflowers, although since the sheep still graze there right ahead of when the native plants reach their bloom times, perhaps most of plants have not shown for a long time. That was certainly the case in Sage Hills, but once the sheep were off of here, the amount and variety of wildflowers has grown exponentially! I will add to this that judging by what can be seen from the road, since the public is prevented from entering Invenergys wind farm, as opposed to Wild Horse Wind Farm, I doubt very much they will control weeds unless forced to and there will be minimal restoration, if any at all.

Please, for once, do a development right and require a full SEPA for this industrial project. In their commentary on the Criteria for Approval, bottom of page 1 and

continuing on page 2 and 3, they indicated that the Sage Hills development, and other adjoining single family properties on 5-20 acre parcels were not actually in compliance with county planning, since the land wasn't being used for agricultural purposes. I'm not sure where they are getting their information, but this land isn't really suitable for agricultural purposes, we've lost all the open space benefits several years ago, but none of us were expecting a huge solar farm to come in front of us and destroy our views of the shrub steppe. If any of the county commissioners would care to see why some of us long time county residents chose to live here, you are welcome to come visit me and perhaps see this end of the valley, since I doubt you come this way often.

Please, consider the pleas of those of us who will be seriously impacted by this project and consider carefully whether you represent the citizens of Kittitas County or a huge corporation from Chicago.

Sincerely,

Mary L. Morgan

291 Sage Hills Drive

Ellensburg, WA 98926

509-899-1412

mary@sagelandproperties.com

DECEIVED

JUN 1 0 2024

Kittitas County CDS

Community Dun Copunt

From: Cory Wright
To: Chace Pedersen

Subject: FW: Cu-24-00003 Schnebly Coulee Solar Farm

Date: Monday, June 10, 2024 8:26:49 AM

----Original Message-----

From: Randal Brown brown 2684@msn.com

Sent: Sunday, June 9, 2024 10:51 AM

To: chace.petersen@co.kittitas.wa.us; Cory Wright <cory.wright@co.kittitas.wa.us>

Subject: Cu-24-00003 Schnebly Coulee Solar Farm

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June 9th Chace Peterson, Cory Write,

My wife and I are owners of lot 11 and family owning lot 12 in Sage Hills Drive. We chose to build a vacation cabin here because we love the views of the Kittitas valley, mountains ranges, and the natural shrub steppe serenity. We are opposed to the industrial scale of the Solar farm as designed for many reasons.

- 1, The proposed site is in the middle of where many people live to the west and to the east right up to the border of our property in Sage hills.
- 2, This industrial size project will drastically lower our property values. The last thing we want to see is a vast expanse of reflective solar panels.
- 3, the design shows the panels right up to the border of Sage hills without any kind of buffer zone.
- 4, The proposed site doesn't have enough green space between the rows of panels to accommodate wildlife like Elk, Deer, Sage Grouse and other small animals. We have witnessed a Badger den on the lower half of lot 12.
- 5, We think if this large construction project moves forward that it will pose a huge fire risk to our homes and property. I'm in the construction industry and I believe that if the project is to be installed all at once without stages the construction crew won't be able to keep hundreds of acres wet enough to reduce the fire risk from construction. It only takes one spark from heavy equipment or one cigarette from one of the crew and a little wind to set Sage hill ablaze with only minutes to evacuate. This puts our lives at risk.

Lastly we believe that a more appropriate spot for a large solar farm would be further east on the same land where the wind generation facilities now operate.

Not around neighborhoods where people live.

Thank You for your time and consideration.

Randal & Kanya Brown lot 11 Randy Brown lot 12 From: <u>Greg Carey</u>
To: <u>Chace Pedersen</u>

Subject: Re: Citizen Comments: CU-24-00003 Schnebly Coulee Solar Farm

Date: Tuesday, June 11, 2024 8:00:50 AM

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Realized I had the email address wrong. Hoping you can still accept.

GC

From: Greg Carey <careygreg@hotmail.com>

Sent: Tuesday, June 11, 2024 7:59 AM

To: chace.pedersen@co.kittitas.wa.us < chace.pedersen@co.kittitas.wa.us > **Subject:** Re: Citizen Comments: CU-24-00003 Schnebly Coulee Solar Farm

From: Greg Carey <careygreg@hotmail.com>

Sent: Monday, June 10, 2024 7:03 AM

To: Chase.pedersen@co.kittitas.wa.us < Chase.pedersen@co.kittitas.wa.us > **Subject:** Re: Citizen Comments: CU-24-00003 Schnebly Coulee Solar Farm

Resending with Word attachment

From: Greg Carey <careygreg@hotmail.com>

Sent: Sunday, June 9, 2024 6:42 AM

To: Chase.pedersen@co.kittitas.wa.us < Chase.pedersen@co.kittitas.wa.us > **Subject:** Citizen Comments: CU-24-00003 Schnebly Coulee Solar Farm

Chase Pedersen,

I own Lot 6 in Sage Hills residential development abutted to the East of the Schnebly Coulee Solar Farm proposed project (CU-24-00003 Schnebly Coulee Solar Farm). My comments and concerns are in the attached document. Please let me know if you have any questions.

Thank you,

Greg Carey

Greg Carey Letter.docx

Greg Carey 1560 Sage Hills Drive Ellensburg, WA 98926 <u>careygreg@hotmail.com</u> (206)823-5712

June 6, 2024

Chase Pederson Kittitas County Chase.pedersen@co.kittitas.wa.us

Dear Mr. Pederson,

I own Lot 6 in Sage Hills residential development abutted to the East of the Schnebly Coulee Solar Farm proposed project (CU-24-00003 Schnebly Coulee Solar Farm). I am writing to oppose this proposal based on how close the project footprint is in relation to existing homes.

I recently relocated to Sage Hills (August of 2023) and did so to embrace the rural lifestyle offered by living in Kittitas County. I did not relocate to the area to be surrounded by an industrial solar farm. I never imagined that a mega solar farm literally in my backyard was a possibility.

I am also extremely concerned about the affect this farm will have on the value of my home. I have read studies funded by power companies that state that solar farms do not affect the value of nearby homes, except for properties located within ¼ mile of the farm site. My property (along with many of my neighbors) is directly adjacent to the proposed solar farm and my residence sits less than 400 yards from the property line. Regardless of which study is referenced, it is agreed upon that properties immediately next to large solar farms will devalue 2.3 to 7.5%. I also question whether this range captures the full possibility of how much my property value could diminish. Studies cite that solar designers go to great lengths to shield farms from neighboring views- but the topography of the proposed site does not allow berms that would be high enough to conceal the panels and the landscape is low-lying sage brush that will also do nothing to conceal the massive 1000+ acre site. It is unfair for my neighbors and I to take on the risk of property value diminishment while the power company profits.

Another contributing factor is conflicting research done on the safety of living near a solar farm. The minimum safe standard that I can find relating to a solar farm of this magnitude states that you should not be within 500 yards of a large solar farm. My home is within 400 yards of the proposed site. Does the danger increase if I decide to spend time on the lower half of my property? It sounds as if more studies need to be done, but regardless, potential buyers will be turned away by the conflicting information at my expense.

When I look at solar farm design standards, I find that many jurisdictions throughout the world require a distance of 1.8 miles from homes to protect their residents from decreased home values, potential health impacts, and a diminished lifestyle. This makes perfect sense and is feasible. When I look around the county there are many areas where a solar farm would not impact any

homes. I truly hope that Kittitas County protects their residents from the many downsides of a solar farm in this location and finds an alternative site. Please deny.

Greg Carey



To Protect and Promote the Health and the Environment of the People of Kittitas County

June 11,2024

Chace Pederson Kittitas County Community Development Services 411 N. Ruby Street, Ste 2 Ellensburg, WA. 98926

Dear Chace,

Public Health has no comment on the Schnebly Coulee Solar Farm CU-24-00003.

If you have any questions, please don't hesitate to give me a call.

Sincerely,

Dan Suggs, Environmental Health Specialist II, B.S



KITTITAS COUNTYDEPARTMENT OF PUBLIC WORKS

MEMORANDUM

TO: All Staff

FROM: Public Works Plan Review Team

DATE: June 12, 2024

SUBJECT: CU-24-00003 Schnebly Coulee Solar Farm

ACCESS	 An approved access permit for commercial access shall be required from the Kittitas County Department of Public Works prior to creating any new driveway access or altering an existing access.
	 Driveways and Roads greater than 150' in length are required to provide a fire apparatus turnaround that is in compliance with Appendix D of the International Fire Code.
	3. Per Kittitas County Code, only one access is permitted. A Road Variance application will need to be applied for if 2 accesses are built. Road
	Variance does not guarantee second access. 4. In addition to the above-mentioned conditions, all applicable Kittitas County Road Standards apply.
ENGINEERING	Except as exempted in KCC 14.05.060, no grading or filling upon a site involving more than one hundred (100) cubic yards shall be performed without a grading permit from the County Engineer or Public Works designee (KCC 14.05.050). An application for grading in excess of five hundred (500) cubic yards shall be accompanied by an engineered grading plan (KCC 14.05.080). (CP)
SURVEY	Survey Monuments (section corners, property corners, and NGS Monument "SB0232"), shall be protected and preserved, or witness corners be established by a land surveyor licensed in the state of Washington. Any destruction or removal of Section Corners shall be coordinated with the Department of Natural Resources. Any destruction or removal of NGS benchmarks, shall be coordinated with the National Geodetic Survey. (JT)
TRANSPORTATION CONCURRENCY	The proposed project may require a Transportation Impact Analysis. Please provide preliminary scoping letter documenting the trip generation, distribution, and assignment for the proposed development application per KCC 12.04.02.040 (KAH)
FLOOD	The proposed project is not located in the FEMA identified special flood hazard area (100-year floodplain). (SC)

WATER	No comments. (SC)
MITIGATION/	
METERING	
AIRPORT	No comments. (JS)

Please contact Kittitas County Public Works (509) 962-7523 with any questions.



STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

June 11, 2024

Chace Pedersen Kittitas County Planning 411 N. Ruby St. Suite 2 Ellensburg WA 98926

RE: CU-24-00003; 202402298

Dear Chace Pedersen,

Thank you for the opportunity to comment during the Optional Determination of Non Significance process for the **Schnebly Coulee Solar Energy LLC.** We have reviewed the documents and have the following comments.

Water Quality Program:

Project with Potential to Discharge Off-Site

If your project anticipates disturbing ground with the potential for stormwater discharge off-site, the NPDES Construction Stormwater General Permit is recommended. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit may take 38-60 days.

The permit requires that a Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) shall be prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water and storm drains by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading, or construction. In the event that an unpermitted Stormwater discharge does occur off-site, it is a violation of Chapter 90.48 RCW, Water Pollution Control and is subject to enforcement action.

More information on the stormwater program may be found on Ecology's stormwater website at: http://www.ecy.wa.gov/programs/wq/stormwater/construction/. Please submit an application or contact Wendy Neet at the Dept. of Ecology, (509) 571-6733. or wnee461@ecy.wa.gov with questions about this permit.

Sincerely,

Jessica Swift

On behalf of SEPA Coordinator Central Regional Office

)essica Swift

509-379-0702

crosepacoordinator@ecy.wa.gov



South Central Region 2809 Rudkin Road Union Gap, WA 98903-1648 509-577-1600 / FAX: 509-577-1603 TTY: 1-800-833-6388 www.wsdot.wa.gov

June 10, 2024

Kittitas County Community Development Services 411 N. Ruby Street, Ste 2 Ellensburg, WA 98926

Attn: Chace Pedersen, Staff Planner

RE: CU-24-00003 - Schnebly Coulee Solar Farm

SR 90, milepost 121.20 Lt

We have reviewed the proposed project and have the following comments:

- The proposed project is located to the north of Interstate 90 (I-90), a fully-controlled limited access facility with a posted speed limit of 70 miles per hour. Direct access to I-90 is prohibited. Access to the project site is available via existing county road interchanges.
- Any proposed utility crossing must be coordinated with the South Central Region Utilities Engineer, Jamil Anabtawi. He can be reached at (509) 577-1785. No open cutting of the highway will be allowed. Any utility crossing must be installed by jacking and/or boring.
- Any signs that may be proposed as part of this project will need to comply with the state Scenic Vistas Act of 1971 (RCW 47.42 and WAC 468-66). Please contact Tanya Joblonski of the WSDOT Headquarters Traffic Office for specifics. She can be reached at (360) 705-7294.
- Any proposed lighting should be directed down towards the site, and away from Interstate 82.

Thank you for the opportunity to review and comment on this proposal. If you have any questions regarding this letter, please contact Aaron Hatfield at (509) 268-8497.

Sincerely,

Stephen P. (Phil) Nugent, Region Planning Manager

SPN: akh/jjp

cc: SR 90, File #2024 090 005

From: Corrine Camuso
To: Chace Pedersen

Cc: Whitlam, Rob (DAHP); David.Witt@dahp.wa.gov; Hanson, Sydney (DAHP); rbailey@blm.gov; Casey Barney;

Jessica Lally; Noah Oliver

Subject: Re: CU-24-00003 Schnebly Coulee Solar Farm - Notice of Application

Date: Tuesday, June 11, 2024 4:25:15 PM

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

Thank you for contacting the Yakama Nation Cultural Resources Program regarding the proposed undertaking located within the traditional territory of the Yakama Nation. We do not see reports available on DAHP to confirm statements made within the SEPA checklist regarding cultural resources. The DAHP WISAARD project does not have the Yakama Nation as a point of contact. There are numerous previously recorded sites within proximity to the proposed undertaking. Our office has concerns about impacts to Yakama Traditional Cultural Properties. Is there a formal initiation letter from the BLM? The SEPA indicates resources associated with Native American landuse were identified. Precontact sites are protected under State Law from disturbance.

We may have further comments pending additional information.

Regards,

Corrine Camuso
Yakama Nation
Cultural Resources Program Archaeologist
Office 509-865-5121 ext. 4776

From: Chace Pedersen <chace.pedersen@co.kittitas.wa.us>

Sent: Tuesday, May 28, 2024 10:44 AM

To: Dan Young; Marvin Douvier (SH); Kim Dawson; adminstaff@kittcom.org; storch@kittcom.org; Julie Kjorsvik; Laura Kukes; Public Health Inspectors; Lisa Lawrence; Patti Stacey; Kelee Hodges; Candie Leader; Tate Mahre; Jackie Sharp; Samantha Cox; Josh Fredrickson; Cameron Curtis; Jeremy Larson; Steph Mifflin; Haley Mercer; Christy Garcia; ken.edwards@kittitaspud.com; DAHP SEPA; Environmental Review; Corrine Camuso; Jessica Lally; Noah Oliver; Casey Barney; Jeff Kozma; Guy Moura; sam.rushing@colvilletribes.com; Connor Armi; darnell.sam.adm@colvilletribes.com; john.sirois.adm@colvilletribes.com; milton.davis.adm@colvilletribes.com; steve@snoqualmietribe.us; dahp@snoqualmietribe.us; Adam Osbekoff; Mau, Russell E (DOH);

From: Marcus, Dylan
To: Chace Pedersen

Subject: Comment for CU-24-00003 Schnebly Coulee Solar Farm - Notice of Application

Date: Wednesday, June 12, 2024 2:37:19 PM

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

Chace,

Sending in the following comment on this application from PSE:

Based on the location of the proposed solar farm it seems likely that the generation project may need to connect to Puget Sound Energy's transmission system in the vicinity. Project managers at Invenergy/the relevant organization coordinating the proposed solar farm project should be sure to reach out to PSE's Transmission Planning and Engineering groups at TransmissionDesign@pse.com to plan for integration into PSE's network as needed.

Thanks,

Dylan Marcus (He/Him)

Municipal Land Planner 6500 Ursula Place South | Seattle, WA 98108 (206) 716-2754 (office) | (206) 225-7568 (cell) Dylan.Marcus@pse.com





State of Washington DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: PO Box 43200, Olympia, WA 98504-3200 · 360 902-2200 · TDD 360 902-2207 Main Office Location: Natural Resources Building, 1111 Washington Street, Olympia, WA

June 12, 2024

Chace Pederson Staff Planner Kittitas County Community Development Services 411 N. Ruby St. Suite 2 Ellensburg, WA 98926

SUBJECT: RE: CU-24-00003 Schnebly Coulee Solar Farm - Notice of Application

Dear Mr. Pederson,

The Washington Department of Fish and Wildlife (WDFW) is committed to working with renewable energy projects to ensure that these projects are sited in a manner that aligns with our agency's mandate to perpetuate fish, wildlife, and their habitat (Regulatory Code of Washington (RCW) 77.04.012) and that fully support goals for decarbonization in Washington State.

Schnebly Coulee Solar Energy LLC (applicant) has coordinated with WDFW regarding biological surveys, vegetation management, and mitigation for shrubsteppe impacts since 2018. Based on biological reports and information offered in the SEPA Checklist, WDFW feels that the applicant has done due diligence to assess and minimize impacts to wildlife but that Chapter 17A.01, Sections 17A.01.100 and 17A.04.070 (Mitigation Requirements and Critical Areas Mitigation-completion of a Mitigation Plan) have not been fulfilled by the applicant. Section 4.1.2.1 of the Habitat Management Plan states that the 625-acre project area is composed of shrub/scrub (79%) and grassland/herbaceous (18%). These habitat types are considered shrubsteppe per WDFW Priority Habitat and Species (PHS) data. This is a priority habitat and required to be mitigated per Kittitas County Critical Area Ordinance (CAO) under Fish and Wildlife Habitat Conservation Areas 17A.04. As a result, the proper designation is not a determination of nonsignificance (DNS), but a mitigated determination of nonsignificance (MDNS). Additionally, this area is mapped as a high conservation area by the Washington Columbia Plateau Least Conflict Solar Siting tool (https://wsuenergy.databasin.org/).

The applicant's current Habitat Management Plan provides details about mitigation but excludes important information regarding conservation easement management and transmission line impacts. However, there has been ongoing discussion between WDFW and the applicant to develop appropriate management strategies for the planned conservation easement, address transmission line impacts, and to incorporate these factors into a Mitigation Plan and updated Habitat Management Plan. We have a few comments regarding the submitted application materials below.

Suggested MDNS language is: "The applicant shall prepare a habitat mitigation plan in conjunction with WDFW to mitigate for loss of critical areas, at a ratio of at least 2:1 for impacts to all priority habitat identified on the project, namely shrubsteppe habitat. These impacts are for all elements within the project fenceline and all permanent impacts such as roads and transmission line outside of the fenceline."

To achieve a MDNS, WDFW requests that the following be addressed:

- A mitigation plan be drafted to include requirements outlined in Chapter 17A.01, Sections 17A.01.100 and 17A.04.070 and the following details previously agreed to between WDFW and the applicant;
 - o Mitigation of at least a 2:1 ratio for all permanent impacts to priority habitats identified on the project site
 - Mitigation actions could include:
 - Specification of parcels to be managed by the applicant as conservation easements
 - Collection of sagebrush seed from vegetation being removed before construction
 - Incorporation of wildlife friendly elk exclusion specifications into the solar perimeter fence with modifications to allow small wildlife movement within the project
- The applicant works with WDFW to create terms for the conservation easement which could include, but not be limited to; protection of land for the life of the project, grazing at or below current levels, and no loss of habitat value by grazing, recreation, or other factors within control of the applicant.
- The applicant specify the exact location and impact acres of the transmission line. These impact acres should be mitigated at a 2:1 ratio due to shrubsteppe impacts and be excluded from the conservation easement.

WDFW looks forward to continuing coordination with the applicant to finalize mitigation, limit impacts to important wildlife and habitat resources, and develop an effective habitat management plan.

Thank you for the opportunity to comment. Please contact me at 509-699-9859 or Emily.Grabowsky@dfw.wa.gov with any questions.

Sincerely,

Emily Grabowsky

Solar and Wind Energy Biologist

cc:

Michael Ritter, WDFW Lead Planner Solar & Wind Energy Development

Michelle Huppert, WDFW Solar and Wind Energy Biologist Scott Downes, WDFW Fish and Wildlife Habitat Regional Land Use Planner Elizabeth Torrey, WDFW Region 3 Habitat Program Assistant Manager Perry Harvester, WDFW Region 3 Habitat Program Manager